

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Rommel Callos BALTAZAR

Case No. 24-30293

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2023 - April 2024 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|----------------------------|---------------------------------|
| 18 U.S.C. § 2252a(A)(2) | Receipt of child pornography |
| 18 U.S.C. § 2252A(a)(5)(B) | Possession of child pornography |

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Special Agent Eli Bowers - FBI

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 25, 2024

City and state: Detroit, Michigan



Judge's signature

Hon. Kimber G. Altman, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Eli Bowers, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2015 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I was employed as a Park Ranger with the National Park Service for approximately six years; my duties included the enforcement and investigation of federal crimes. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post-Academy training, and everyday work related to conducting these types of investigations.

2. As part of my duties, I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Moreover, I am a federal law enforcement officer who is engaged

in enforcing criminal laws, including 18 U.S.C. §§ 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Rommel Callos Baltazar for violations of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing a complaint and an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Baltazar has violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B).

FACTS ESTABLISHING PROBABLE CAUSE

6. While investigating transaction data relating to an online operator known to be offering child pornography and child sexual abuse material (CSAM) for sale, FBI agents identified a specific cryptocurrency account (the Subject Account), which had sent three separate cryptocurrency payments to accounts

linked to the online CSAM operator. These transactions by the Subject Account were dated on March 27, 2023, March 31, 2023, and April 3, 2023, and were for a combined total of approximately \$750.

7. On April 21, 2023, agents obtained client information for the Subject Account. This information identified Rommel Baltazar as the account subscriber and included Baltazar's date of birth and Social Security Number, a copy of his Michigan Driver's License, and his home address. Based on this and other information, search warrants were obtained for Baltazar's residence in Grosse Pointe Farms, Michigan, which is in the Eastern District of Michigan, and for Baltazar's person.

8. On April 11, 2024, the search warrants were executed. Baltazar was the only person residing in the home. Agents seized multiple electronic devices, including a laptop with an external hard drive connected to it.

9. Agents' forensic review of the approximately three terabytes of data on the external hard drive is ongoing. So far, they have found that it solely contained sexually suggestive or explicit material. The images and videos were categorized in hundreds of separate folders, organized by name. Some of the folders contained nude and/or sexually explicit images and videos of girls. Many of the folders' names included both the name and the purported age of the person

depicted in the images and videos. For example, a folder would be titled, “[Minor Victim Name] ([Age]).”

10. The following are examples of the material observed during an initial review of the hard drive:

- a. Folder titled “V1 [Minor Victim 1] (12)”
 - i. Eight images of an approximately 12-year-old girl’s vagina.
 - ii. Five videos of the same girl masturbating and undressing which depict her vagina.
 - iii. Approximately 64 images and five videos of the girl which depict her in various states of undress, in only her underwear, depicting her nude breasts, or similar poses.
- b. Folder titled “V1 [Minor Victim 2] (10)”
 - i. Four images of an approximately 10-year-old girl nude, which depict her vagina from multiple angles.
 - ii. Twenty-one images of the girl which depict her in various states of undress, in only her underwear, depicting her nude breasts, or other sexually suggestive poses.

11. Some of the videos on Baltazar's external hard drive have been matched by FBI Headquarters with content for sale by the online CSAM operator, referenced above. An example of one of these is a video depicting a nude girl, approximately 13 years old, sitting on the floor with her legs spread. The camera is positioned on the floor in front of her and clearly shows her breasts and vagina. The girl is rubbing her chest with her hands and telling the camera, "Please let me go to sleep, I'm so tired, I'm so desperate for sleep, please."

12. Creation and last accessed dates associated with the content described above correspond with times on or about April 4, 2023. April 4, 2023, is one day after Baltazar made his third cryptocurrency payment to accounts associated with the online CSAM operator. This date would be consistent with Baltazar receiving the files after making his cryptocurrency payments, and then either accessing or copying the files to the external hard drive on or about the date of April 4, 2023.

13. An initial review of Baltazar's laptop shows that the computer contained approximately 690,000 images and 32,000 videos. Many of the videos appeared to be of young girls between the ages of 14 and 19 masturbating, engaged in sexual acts, or other exposures of their genitalia.

14. There was also additional evidence demonstrating that Baltazar had received child pornography. For instance:

- a. There were approximately 89 visits to the online CSAM operator's website between March 27 and October 8, 2023, including the "How To Buy Content" section of the site.
- b. There is a screenshot of a cryptocurrency transaction from March 27, 2023, which had the same recipient, date, and transaction amount as one of the aforementioned three payments from the Subject Account to accounts linked to the online CSAM operator.
- c. Between April 5, 2023, and February 10, 2024, the laptop user accessed files that included references to the online CSAM operator in the file names. This included files in folders named "[Minor Victim 3] (13)" and "[Minor Victim 4] (14)," among others.

CONCLUSION

15. Based on the foregoing, there is probable cause to believe that Rommel Callos Baltazar has committed violations of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Eli Bowers, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: July 25, 2024